## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

MAIRA MONTELONGO,	§
Plaintiff,	§
	§
v.	§
	§ Civil Action No. 5:19-cv-00577-JKP-RBF
My Financial Solutions LLC, Student Renew	§
LLC, Angela Mirabella, and Nick Caposio	§ JURY DEMANDED
	§
Defendants.	§

## STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE

COMES NOW, Plaintiff MAIRA MONTELONGO and Defendants MY FINANCIAL SOLUTIONS, LLC, STUDENT RENEW LLC, ANGELA MIRABELLA, AND NICK CAPOSIO (together known as the "**Parties**"), and file their *Stipulated Motion for Dismissal With Prejudice* (the "*Motion*") as follows:

 The Parties have settled and compromised all claims that are asserted against the Defendants, and Plaintiff no longer desire to pursue this action and wishes to dismiss all claims against all Defendants with prejudice.

- 2. Through its counsel's signature below, Defendant agrees and consents to Plaintiff's dismissal pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii).
- 3. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2
- 4. A receiver has not been appointed in this case.
- 5. This case is not governed by any federal statute that requires a court order for dismissal.
- 6. Plaintiff has not voluntarily dismissed any federal or state court suit based on or including the same claims as those presented in this case.

WHEREFORE, PREMISES CONSIDERED, the Parties jointly and respectfully request this Court to enter this motion

Respectfully Submitted,

/s/Leland Garrett McRae Counsel for Plaintiff 1150 N. Loop 1604 W., Ste. 108-461 San Antonio, TX 78248 (210) 569 – 0434 SBN: 24086374 leland@lelandmcrae.com

## /s/Chuck Bretz

Counsel for Defendants Bretz, Flynn & Associates, P.C. 58 N. Chicago St., 2d Floor Joliet, IL 60432 (815) 740-1545 cbretz@bretzlawoffice.com

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been filed and served to Plaintiff's counsel via **CM/ECF** on this 7th day of May, 2020 to:

/s/Chuck Bretz Counsel for Defendants Bretz, Flynn & Associates, P.C. 58 N. Chicago St., 2d Floor Joliet, IL 60432 (815) 740-1545 cbretz@bretzlawoffice.com

> /s/ Leland McRae LELAND MCRAE